

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,

vs.

STATE OF HAWAII
DEPARTMENT OF EDUCATION;
PATRICIA HAMAMOTO,
Superintendent of Hawai'i Schools,
MEREDITH MAEDA, Principal,
Castle High School; SARA
GRONNER OR GRONNA, Vice
Principal of Castle High School,

Defendants.

CIVIL NO. 04-00390 JMS-KSC

DECLARATION OF NELSON Y.
NABETA

DECLARATION OF NELSON Y. NABETA

I, NELSON Y. NABETA, declare under penalty of perjury, as follows:

1. Declarant is currently employed as a Deputy Attorney General for the Department of the Attorney General for the State of Hawai'i, and is familiar with the facts and circumstances of the above case;
2. The information contained in the Defendants Motion to Quash Subpoenas and/or for Protective Order for Subpoenas Issued to Virginia

Soares and Yoon Ok Won, is true and correct to the best of Declarant's knowledge and belief;

3. Exhibit "A" is a true and correct copy of the Subpoena for Virginia Soares;

4. Exhibit "B" is a true and correct copy of the Subpoena for Yoon Ok Won;

5. Exhibit "C" is a true and correct copy of Plaintiff's First Request for Production of Documents to Defendant State of Hawai'i, Department of Education, dated April 5, 2005; and

6. Exhibit "D" is a true and correct copy of Order Granting in Part and Denying in Part Plaintiff's Motion to Compel Answers to Interrogatories and Production of Documents or for Sanctions Against Defendant State of Hawaii, filed on August 29, 2005.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, March 28, 2007.

/s/NELSON Y. NABETA
NELSON Y. NABETA